

BEFORE THE  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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OFFICE OF THE SECRETARY

Experimental "Ride-Along" Classification Change )  
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Docket No. MC2000-1

COX TARGET MEDIA, INC.  
AND COX CONSUMER SAMPLING  
RESPONSE TO USPS MOTION FOR EXPEDITION  
(October 25, 1999)


Cox Target Media, Inc. and Cox Consumer Sampling (hereinafter "the Cox Companies"), proceeding jointly herein, pursuant to the Commission's Order No. 1264 issued herein September 30, 1999, submit this response to the Postal Service's Motion for Expedition and for Waiver of Certain Provisions of Rules 64(h).

As explained in their Notices of Intervention herein, the Cox Companies believe that the Postal Service's request presents certain issues that should be explored through discovery, and possibly through a hearing. Those issues include the postal policy implications of mixing classes of mail irrespective of content, the projected diversion of mail from other classes and subclasses of mail that would result from the proposed experiment, and the revenue effect thereof, as well as the effects of the experiment upon other users of the mails. It is not yet certain whether those issues, or others, involve genuine issues of material fact.

The Cox Companies believe that the foregoing are important issues that should be fully explored through discovery, and possibly through a hearing. Although the Postal Service has requested that this proceeding be expedited, there does not appear to be any pressing need for expedition. Nevertheless, the Cox Companies do not oppose the use of expedited procedures, including an expedited schedule, if that schedule will give the Office of the Consumer

Advocate and all intervenors sufficient time and opportunity to conduct discovery sufficient to explore the issues they deem important. Moreover, if the discovery process should reveal genuine issues of material fact, the Postal Service's request is opposed by one or more intervenors, or this case is not susceptible to settlement, further proceedings herein may be warranted.


Respectfully submitted,

  
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Counsel for Cox Target Media, Inc.  
and Cox Consumer Sampling

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with Section 12 of the Rules of Practice.

  
John S. Miles

October 25, 1999